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PRACTICE LIMITED TO MATTERS BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION

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August 12, 1993

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AUG 13 1993  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**VIA COURIER**

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

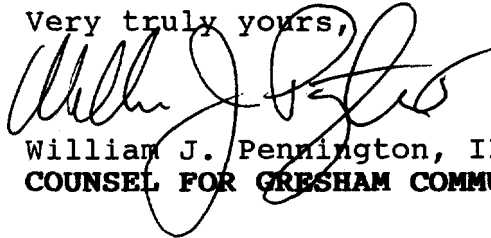
RE: Comments in MM Docket No. 93-169

Dear Sir:

Transmitted herewith, on behalf of Gresham Communications, Inc., licensee of WPAL-FM at Walterboro, South Carolina, is an original and four copies of its Comments in the above-captioned proceeding.

Should there be any questions regarding this matter, please do not hesitate to contact the undersigned.

Very truly yours,



William J. Pennington, III  
COUNSEL FOR GRESHAM COMMUNICATIONS, INC.

Enc.  
WJP/tlt

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Before the  
FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

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AUG 13 1993

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
Table of Allotments )  
FM Broadcast Stations )  
(Walterboro and Ridgeville, )  
South Carolina) )

MM Docket No. 93-169  
RM-8246

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Chief Allocations Branch

COMMENTS

Gresham Communications, Inc. ("Gresham"), licensee of FM station WPAL-FM, Walterboro, South Carolina, an petitioner in this matter, by its attorney, hereby submits its comments in the above captioned proceeding. In support the following is stated:

1. Gresham continues to have an interest in the reallotment of Channel 265C3 from Walterboro to Ridgeville, South Carolina and the modification of Station WPAL-FM's license to specify Ridgeville as its new community of license. If the channel is reallocated to Ridgeville, Gresham will immediately tender for filing an application seeking the facilities changes, and when granted, construct the new facilities.

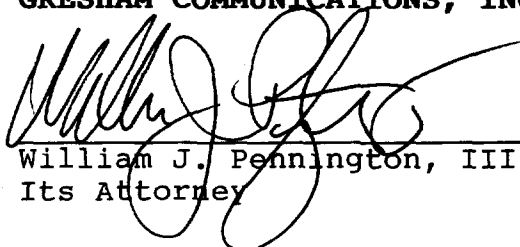
2. The Commission, in the Notice of Proposed Rule Making released in this proceeding, requested that the Petitioner submit information showing the areas and populations that will lose an existing service and receive a new service if the reallotment to Ridgeville is implemented as well as the number of existing

reception services which are now available within the gain and loss areas. This information is provided in Exhibit 1, attached hereto.

WHEREFORE, Gresham Communications, Inc. respectfully requests, that after consideration of this attached material and showing of continuing interest, that the Commission reallocate Channel 265C3 from Walterboro, South Carolina to Ridgeville, South Carolina so to provide that community with its first local FM transmission service and modify Station WPAL-FM's license to specify Ridgeville as its community of license.

Respectfully submitted,

**GRESHAM COMMUNICATIONS, INC.**



William J. Pennington, III  
Its Attorney

Post Office Box 2506  
Pawleys Island, SC 29585  
(803) 237-2591

Date: August 11, 1993

## EXHIBIT 1

If Channel 265C3 were reallocated to Ridgeville, South Carolina from Walterboro no white or gray area would be created in the area that would lose 60 dBu service from WPAL-FM. Conversely, no white or gray area would be eliminated within the area that would gain service if the channel were reallocated to Ridgeville. Both loss and gain areas receive an abundance of existing FM service. Included herein is Attachment 1, a map outlining the loss area; Attachment 2, a map outlining the gain area; Attachment 3, a map showing the gain and loss areas and the 60 dBu service contours of existing FM stations which cover all or part of those two areas. Attachment 4 is a list of all existing stations which cover all or part of the gain and loss areas.

The reallocation of Channel 265C3 from Walterboro to Ridgeville, will allow WPAL-FM to greatly increase the number of persons served with its 60 dBu service contour. Presently, operating with a directional antenna from a site south of Walterboro, there are 206,405 persons within the WPAL-FM 60 dBu service contour. If the channel is reallocated to Ridgeville, the persons within the 60 dBu service contour would increase to 295,979 persons. This represents a net increase of 43.4 percent in total population served within the WPAL-FM 60 dBu service contour. If Channel 265C3 is reallocated to Ridgeville, 9,348

persons will lose 60 dBu service from WPAL-FM while 89,574 persons will gain a new 60 dBu service from the station. This represents a net gain of 80,226 persons receiving a new 60 dBu service.

The area where service would be lost is sparsely populated, and is primarily made up of coastal marsh or fresh water swamp in lower Colleton and Charleston Counties. The loss area does not contain any incorporated communities over 1,000 persons. The area where service would be gained is more heavily populated and includes a number of incorporated communities. Within the gain area are the communities of St. George, Holly Hill, Moncks Corner, Goose Creek, Ladson, Hanahan and a large portion of North Charleston.

The land area served by WPAL-FM would be increased if the channel were reallocated to Ridgeville. At the authorized WPAL-FM antenna site, the station's 60 dBu service contour covers 4,591 square kilometers. If reallocated to Ridgeville, the station's 60 dBu service contour would encompass 4,811 square kilometers. This increase would be the result of the presence of higher terrain for the antenna site as well as the ability of the station to operate nondirectionally. At present, operating directionally, WPAL-FM must suppress radiation in one direction so not to create a prohibitive overlap with first adjacent channel station WLVH at Hardeeville, South Carolina, on Channel 264C2. Unlike AM station's, although operating directionally, an FM facility can not increase the distance to its 60 dBu contour past what is

allowed for nondirectional operation. In essence, directional operation of an FM station reduces the land area served by the 60 dBu service contour.

In conclusion, the reallocation of Channel 265C3 from Walterboro to Ridgeville, South Carolina significantly increases both the net population receiving 60 dBu service from WPAL-FM as well as the land area the station will serve. The persons losing 60 dBu service from WPAL-FM, due to the change in antenna site, currently receive an abundance of existing FM service from nearby stations.

# CHARLOTTE

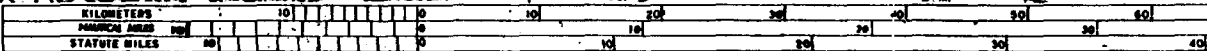
SECTIONAL AERONAUTICAL CHART  
SCALE 1:500,000

ATTACHMENT 1  
LOSS AREA

60 dBu Service Contour From  
Proposed Reallocation Site

60 dBu Service Contour From  
Present Authorized Site

Loss Area if Channel Reallocated



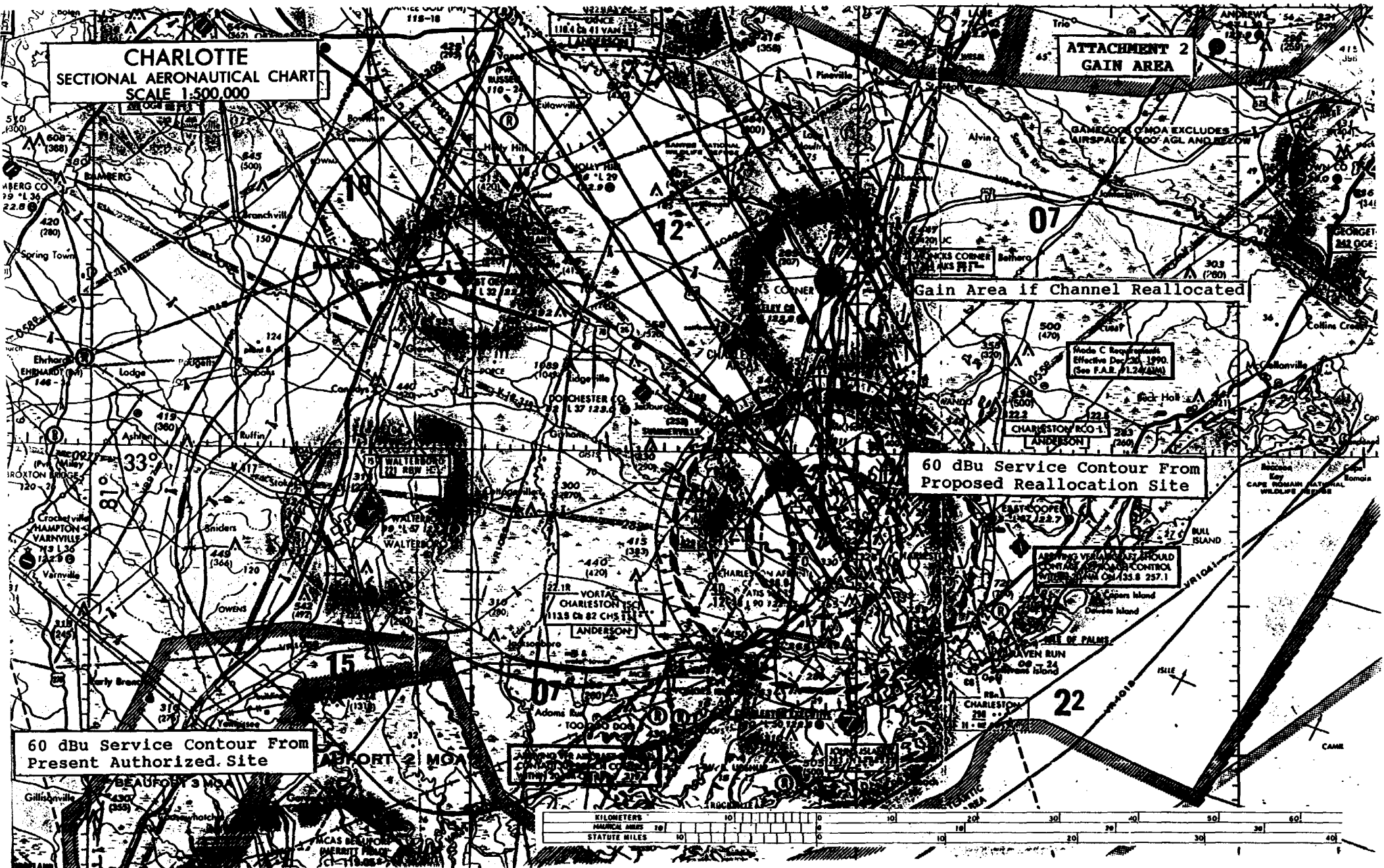
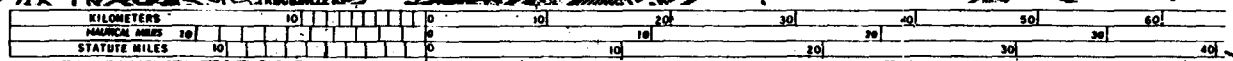
# **CHARLOTTE** SECTIONAL AERONAUTICAL CHART SCALE 1:500,000

**ATTACHMENT 2**  
**GAIN AREA**

Gain Area if Channel Reallocated

60 dBu Service Contour From  
Proposed Reallocation Site

60 dBu Service Contour From  
Present Authorized Site





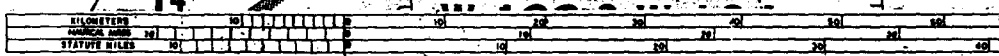
ATTACHMENT 3  
RECEPTION SERVICES IN LOSS AND GAIN AREAS

Proposed WPAL-FM  
60 dBu Contour

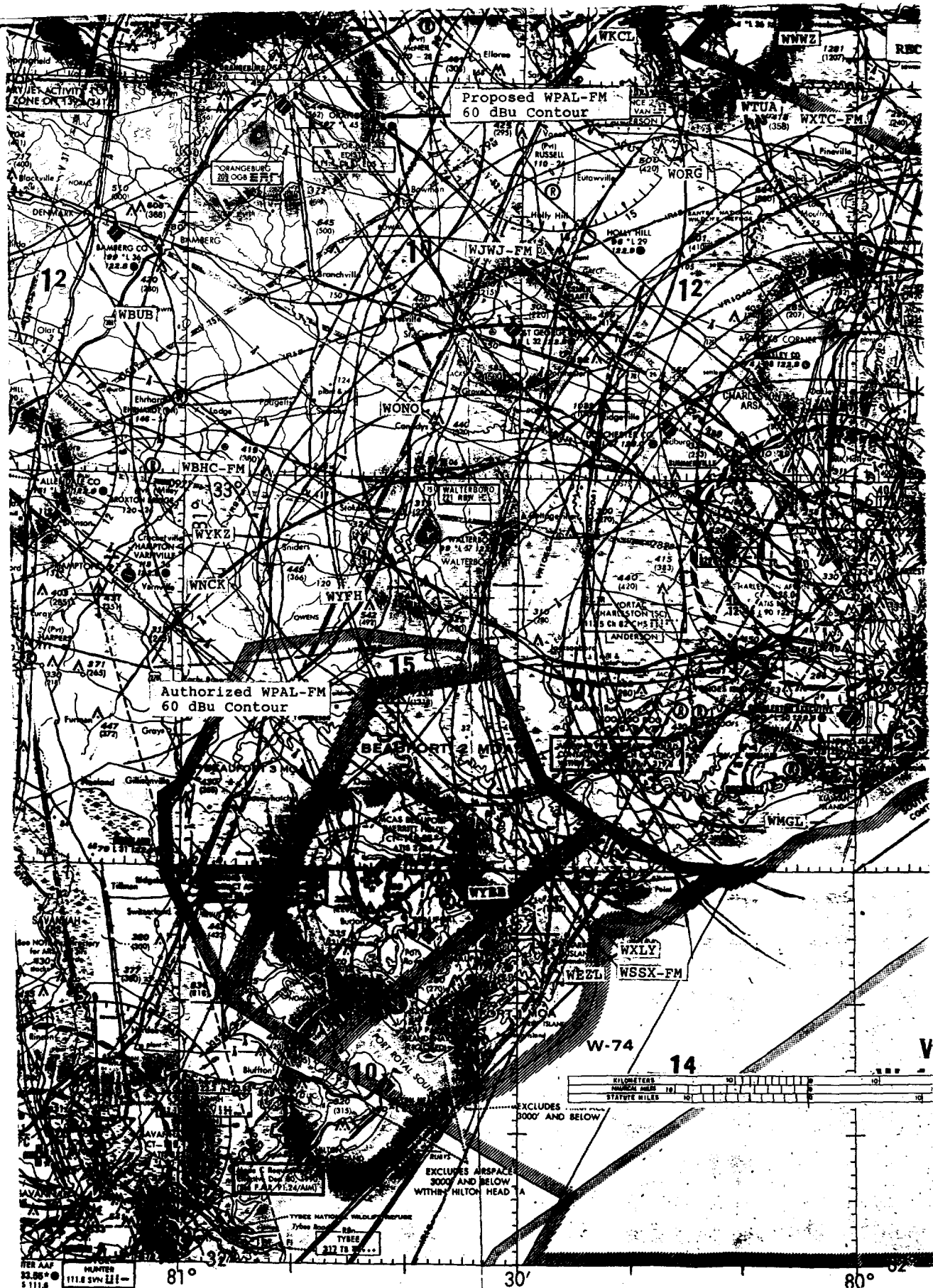


CHARLOTTE  
SECTIONAL AERONAUTICAL CHART  
SCALE 1:500,000

WARNING



EXCLUDES AIRSPACE  
3000' AND BELOW  
WITHIN HILTON HEAD



RECEPTION SERVICES AVAILABLE WITHIN GAIN AREA

Call Sign	Town of License	Frequency	Power	HAAT
WBUB	St. George, SC	107.5	100 KW	300 m
WNCK	Port Royal, SC	99.7	100 KW	369 m
WYBB	Folly Beach, SC	98.1	50 KW	146 m
WORG	Elloree, SC	100.3	25 KW	100 m
WSSP	Goose Creek, SC	94.3	2.9 KW	146 m
WMGL	Ravenel, SC	101.7	3 KW	100 m
WJYQ	Moncks Corner, SC	105.5	1.4 KW	148 m
WTUA	St. Stephen, SC	105.9	3 KW	100 m
WSUY	Charleston, SC	100.5	17.5 KW	120 m
WEZL	Charleston, SC	103.5	100 KW	201 m
WXLY	North Charleston, SC	102.5	100 KW	305 m
WSCI-FM	Charleston, SC	89.3	100 KW	166 m
WAVF	Hanahan, SC	96.1	100 KW	164 m
WXTC-FM	Charleston, SC	96.9	100 KW	540 m
WKCL	Ladson, SC	91.5	100 KW	91 m
WSSX-FM	Charleston, SC	95.1	100 KW	317 m
WDXZ	Mount Pleasant, SC	104.5	28 KW	200 m
WYFH	North Charleston, SC	90.7	50 KW	150 m
WFCH	Charleston, SC	88.5	29.5 KW	93 m
WWWZ	Summerville, SC	93.3	50 KW	150 m
WHLZ	Manning, SC	92.5	100 KW	357 m

**RECEPTION SERVICES AVAILABLE WITHIN LOSS AREA**

Call Sign	Town of License	Frequency	Power	HAAT
WBUB	St. George, SC	107.5	100 KW	300 m
WNCK	Port Royal, SC	99.7	100 KW	369 m
WYBB	Folly Beach, SC	98.1	50 KW	146 m
WONO	Walterboro, SC	93.7	6 KW	100 m
WBHC-FM	Hampton, SC	103.1	3 KW	100 m
WMGL	Ravenel, SC	101.7	3 KW	100 m
WJWJ-FM	Beaufort, SC	89.9	47 KW	335 m
WYKZ	Beaufort, SC	98.7	100 KW	216 m
WSUY	Charleston, SC	100.5	17.5 KW	120 m
WEZL	Charleston, SC	103.5	100 KW	201 m
WXLY	North Charleston, SC	102.5	100 KW	305 m
WSCI-FM	Charleston, SC	89.3	100 KW	166 m
WAVF	Hanahan, SC	96.1	100 KW	164 m
WXTC-FM	Charleston, SC	96.9	100 KW	540 m
WKCL	Ladson, SC	91.5	100 KW	91 m
WSSX-FM	Charleston, SC	95.1	100 KW	317 m
WDXZ	Mount Pleasant, SC	104.5	28 KW	200 m
WYFH	North Charleston, SC	90.7	50 KW	150 m
WFCH	Charleston, SC	88.5	29.5 KW	93 m
WWWZ	Summerville, SC	93.3	50 KW	150 m